



**FILED**

United States District Court  
Eastern District of California

OCT 07 2024

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY TMN  
DEPUTY CLERK

Randall L. Dougherty, Sr., Individually and on behalf of the Estate  
of Randall B. Dougherty, Jr., Deceased; and Jolene Dougherty

Plaintiff(s)

Case Number: 1:24-cv-00818-KES-EPG

V.

Target Corporation, et al.

**APPLICATION FOR PRO HAC VICE  
AND PROPOSED ORDER**

Defendant(s)

Pursuant to Local Rule 180(b)(2) of the United States District Court for the Eastern District of California,

Dixie T. Wells hereby applies for permission to appear and participate as  
counsel in the above entitled action on behalf of the following party or parties:

Defendants Target Corporation, Empower Brands, LLC and Tristar Products, Inc.

On August 21, 1999 (date), I was admitted to practice and presently in good standing in the  
Supreme Court of North Carolina (court). A certificate of good standing from that court is  
submitted in conjunction with this application. I have not been disbarred or formally censured by a court of  
record or by a state bar association; and there are not disciplinary proceedings against me.

I have  I have not concurrently or within the year preceding this application made a pro hac vice  
application to this court. (If you have made a pro hac vice application to this court within the last year, list  
the name and case number of each matter in which an application was made, the date of application and  
whether granted or denied.)

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Date: September 30, 2024

Signature of Applicant: /s/ Dixie T. Wells

**Pro Hac Vice Attorney**

Applicant's Name: Dixie T. Wells

Law Firm Name: Ellis & Winters LLP

Address: P.O. Box 2752

City: Greensboro State: N.C. Zip: 27402

Phone Number w/Area Code: (336) 217-4193

City and State of Residence: Greensboro, North Carolina

Primary E-mail Address: Dixie.Wells@elliswinters.com

Secondary E-mail Address: Crystal.Boyd@elliswinters.com

I hereby designate the following member of the Bar of this Court who is registered for ECF with whom the Court and opposing counsel may readily communicate regarding the conduct of the case and upon whom electronic notice shall also be served via the Court's ECF system:

Local Counsel's Name: Eileen Ahern

Law Firm Name: Willenken LLP

Address: 707 Wilshire Blvd., Suite 3850

City: Los Angeles State: CA Zip: 90017

Phone Number w/Area Code: (213) 955-9240 Bar #: 216822

**ORDER**

The Pro Hac Vice Application is APPROVED. The Pro Hac Vice Attorney is DIRECTED to request filing access through PACER.

Dated: 10/7/24

  
JUDGE, U.S. DISTRICT COURT

DIXIE T. WILSON